

## UNITED STATES DISTRICT COURT

## SOUTHERN DISTRICT OF FLORIDA

Case No. \_\_\_\_\_ - Civ (Honorable: \_\_\_\_\_)

DAVID MAIER MANASHER

Plaintiffs

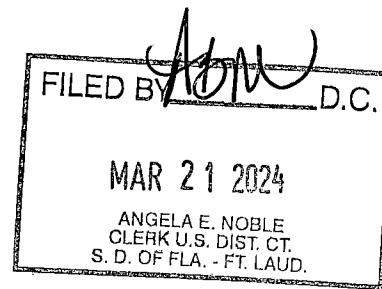
vs.

ELMIRA KARIMOVA CROMAS

*and*

SANIYYA KARIMOVA

Defendants

**CERTIFICATION OF DAVID MAIER MANASHER**

I, David Manasher, of full age, hereby appear on my oath and certify as follows:

1. I am a plaintiff in the above-captioned matter and defendant's former domestic partner. I am making this Certification in support of my verified complaint for assault and battery, invasion of privacy, intentional infliction of emotional distress, negligent infliction of emotional distress, physical irreparable harm and trauma, malicious prosecution against Defendant.
2. I am making this Certification based upon my own personal knowledge (unless otherwise indicated) and I am fully ready, willing, and able to testify if so required.
3. I met Elmira Karimova-Cromas on August 4, 2018, at the time I owned and operated a Russian Restaurant in New York City known as "ONEGIN" aside from my legal career and several other businesses I owned at the time.
4. When I met the defendant our relationship was based on pure love and friendship.
5. In the beginning, I was head over heels and was madly in love with Elmira Karimova-Cromas, to me she was a woman I was going to eventually marry and start a family with.
6. Elmira Karimova-Cromas also knew that I was previously married and had two kids at the time.
7. On or about September 10, 2018 while Elmira Karimova-Cromas was at her friend's wedding in India and I moved from my New York City apartment to a Townhouse at 72 Osprey Court Secaucus New Jersey 07094.
8. Upon Elmira Karimova-Cromas return I advised her that I moved to New Jersey.

9. On or about September 20, 2018 Elmira Karimova-Cromas told me that her lease in Queens, New York where she was living in studio apartment was about to expire in October of 2018 and that she was also looking to move to New Jersey.
10. Since our relationship was flourishing and we were in love with each other I offered Elmira Karimova-Cromas to move to my place.
11. At that time I did not know what Elmira Karimova-Cromas was doing for a living and who she affiliated with only knew that she working somewhere in New Jersey.
12. On or about October 15, 2018 Elmira Karimova-Cromas moved in to my new place known as 72 Osprey Court Secaucus New Jersey 07094.
13. Since the beginning of our relationship I covered the rent and never allowed for Elmira Karimova-Cromas to cover any bills.
14. Elmira Karimova-Cromas advised me that she would pay for one utility so that she can show she has an address in New Jersey.
15. In addition the purpose for the utility bill to be in her name was also to appropriate her consolidation of family with her mother in the eyes of USCIS immigration services since her moving documents for that purpose were pending.
16. During Elmira Karimova-Cromas's residency at 72 Osprey Court Secaucus New Jersey 07094 never once has she paid rent or any other expenses pertaining to dwelling except a light bill.
17. I never asked Elmira Karimova-Cromas to pay anything because I truly loved her and cared for her and did not want her to spend any money.
18. On or about November of 2018 I met an individual by the name of Oleg Zhitnikov who claimed to be Elmira Karimova-Cromas's friend and was always calling for advise because of his issues and problems of staying faithful to other women.
19. At the time Oleg Zhitnikov was having an affair with a married woman who also happened to be Elmira Karimova-Cromas friend Victoria Kolarzh.
20. I did not pay no mind to Elmira Karimova-Cromas relationship to Oleg Zhitnikov and in fact was never in the way since I trusted her with all my heart.
21. In December of 2018 Elmira Karimova-Cromas started to get extremely jealous of me visiting my 7 year old son at my x-wife's house.
22. My son and I are always extremely close and I wanted to spend as much time as I can with him after work sometimes and on certain days when both of us were available.

23. On several occasions my son stayed in my town house over night at 72 Osprey Court Secaucus New Jersey 07094 where me and Elmira Karimova-Cromas resided, that is until Elmira Karimova-Cromas started to make life threats towards my son much later.
24. Because of Elmira Karimova-Cromas's jealousy I made a decision for my son not spend the night with us any longer which affected me and my relationship with my
25. On or about January of 2019 Elmira Karimova-Cromas told me she is receiving calls from my x-wife Violetta Abramova regarding my relationship with Elmira Karimova-Cromas.
26. After speaking to Violetta Abramova I was told that she never contacted Elmira Karimova-Cromas nor had any conversations with her, after which I became skeptical of our relationship and trust.
27. On or about March of 2019 Violetta Abramova came to my residence in panic at 72 Osprey Court Secaucus NJ 07094 stating that Elmira Karimova-Cromas constantly sending Violetta Abramova messages regarding my relationship with Elmira Karimova-Cromas taunting and harassing her with different phone numbers, blocked and spoofed which caused me grief and panic as well as discomfort.
28. I spoke to Elmira Karimova-Cromas that morning and explained to her I do not know what is happening but I want it to end immediately in which she denied ever calling my x-wife Violetta Abramova.
29. On or about April of 2019 I was contacted by my friend who is a Private Investigator Licensed in New Jersey and New York area (who will be named in discovery and on my list of witnesses) telling me that an individual female through third party male un-named to me at the time requested information about me and my current asset holdings at that time. My friend who is a licensed Private Investigator controls any and all third party information data software for PI's. I did not know what this was about and I panicked because I have no one who would do that especially female and the last individual I thought it would be is Elmira Karimova-Cromas.
30. At that time I had several properties in Naples Florida, Aberdeen New Jersey, Keyport New Jersey, Fort Lee New Jersey and New York City.
31. I immediately transferred any and all property and estate from my personal name to Trusts to secure and protect myself from any potential harm spending in excess of \$17,392.10 (any and all receipts and conveyance will be provided through discovezy).
32. On or about May of 2019 me and Elmira Karimova-Cromas got into a very bad argument about my son and my visitation with him at which point Elmira Karimova-Cromas took a shoe and started repeatedly physically hitting me with it in terms causing bruises and several scratches.

33. This incident caused me to sustain not only physical harm but harm mentally as well thinking I did something wrong and I may have deserved it.
34. I did not report this issue to the Police at that time because I sincerely loved and cared for Elmira Karimova-Cromas and the last thing I wanted to do is hurt her.
35. In June of 2019 Elmira Karimova-Cromas's sister Gulnara Karimova came to visit us from Samara Russian Federation.
36. I welcomed Gulnara Karimova with open arms because she is a great individual and good proper person me and her have many things in common since we were the same age.
37. In mid June of 2019 me and Elmira Karimova-Cromas planned a birthday party for Elmira Karimova-Cromas in the Hamptons NY.
38. Elmira Karimova-Cromas invited her friends with approximately 20 people with of course her sister being a guest at the party.
39. At the party Elmira Karimova-Cromas under the influence of cocaine and maybe other drugs and alcohol started acting in a very violent way towards me, her sister and other individuals at the party.
40. I personally invested energy and time cooking for 20 people all weekend long trying to please Elmira Karimova-Cromas and all her friends out of love and care.
41. On the first day of the party I noticed Elmira Karimova-Cromas had small powder in her nostrils I did not say anything to her because I figured it was her choice however I did not want to say anything to her to upset her at the time because of her birthday.
42. Later that night me and Elmira Karimova-Cromas got into a serious argument because of her vulgar and violent behavior thus turning later into a physical altercation where Elmira Karimova-Cromas starting hitting me with her fist and slapping me in my face.
43. Further Elmira Karimova-Cromas accused me and Gulnara Karimova that we are sleeping together in front of her friend Victoria Kolarzh and others.
44. I was embarrassed and emotionally hurt in front of 20 people since how it was not true and Elmira Karimova-Cromas actions were a result of drugs and alcohol.
45. That night I sustained not only physical abuse but for the first time I saw that Elmira Karimova-Cromas may be suffering from psychological disorder caused by influence of drugs and alcohol.
46. That night I was exposed towards severe emotional harm further leading into more physical health issues specifically high blood pressure.

47. The next day Elmira Karimova-Cromas started to apologize to me and all her friends for her improper behavior.
48. That same weekend Alexander Kolarzh Victorias husband stated that some of Elmira Karimova-Cromas friends are sketchy and I asked in which way? His statement and I quote I think "Two of Elmira Karimova-Cromas friends maybe girls from an escort service."
49. I did not know what to answer however after looking at their demeanor and further talking to them my opinion of them was in agreement with Alexander Kolarzh.
50. From that day I started thinking that Elmira Karimova-Cromas is not the woman that I know and live with and that I may be a target of inevitable potentially be induced for some financial gain.
51. After we came back from a birthday party Elmira Karimova-Cromas apologized to me and her sister, however my mind was not at ease and I was extra cautious from that day on.
52. In August of 2019 Gulnara Karimova leaves back to Russia and once again me and Elmira Karimova-Cromas were alone.
53. In August of 2019 me and Elmira Karimova got into a serious argument about my sons visitation and claims of me potentially sleeping with my x-wife which were untrue.
54. On August 24, 2019 Elmira Karimova-Cromas verbally by phone threatened my son and my x-wife stating she would harm them if I was to continue seeing my son.
55. Because of my love and care for Elmira Karimova-Cromas I did not want to report this matter to the police nor to hurt her in any way (recording of the telephone conversation will be provided at discovezy).
56. Same day on August 24, 2019 I came home I was attacked and beaten by Elmira Karimova-Cromas sustaining bruises (photographs and video recording of the incident will be available at discovezy).
57. This incident caused severe emotional trauma and fear for the life of my son and xwife.
58. On October 8, 2019 after coming home from work Elmira Karimova-Cromas started screaming and yelling breaking doors in the house about her life and how she needs to be married and not live with me (conversation and video recording available and will be produced at discovery).
59. I explained to Elmira Karimova-Cromas that I do not want to continue in this relationship and I think that we should break up.
60. During the conversation Elmira Karimova-Cromas started threatening me accusing me for potentially using her for her body and that she wants compensation for that purpose in the amount of \$70,000.00.
61. I told her that I was not capable to give her those funds even if I wanted to simply because I lost my restaurant and was recovering from various financial debts related to the loss.

62. I indicated to Elmira Karimova-Cromas that my job regardless of whatever I'm going through financially is to put a roof over our heads and make sure that we live in comfort despite anything that I'm going through.
63. Elmira Karimova-Cromas called many names accusing me of having an affair with my x-wife and other women when in fact the only woman I loved and cared about was Elmira Karimova-Cromas, even when I was arguing with her my intentions of breaking up were not as solid however in the back of my mind I knew that this relationship will escalate into further emotional distress and potential physical harm to me if it did not end.
64. On October 9, 2019 Elmira Karimova-Cromas was writing her friend Oleg Zhitnikov and as she went to the bathroom her phone was open with a conversation about me and as to what she should do to with me potentially in marriage and questions about my assets.
65. At the time I realized that the inquiry made to Private Investigator to find out about my financial holdings in April of 2019 was made by Elmira Karimova-Cromas and no one else further was confirmed by the Private Investigator later the inquiry was made by Elmira Karimova-Cromas.
66. On October 9, 2019 I confronted Elmira Karimova-Cromas with her conversation with Oleg Zhitnikov thus turning into a huge argument where Elmira KarimovaCromas threw a glass which shattered and particle hitting my arm causing physical harm {the conversation and the incident was recorded on my phone through voice and will be available at discovezy}.
67. On October 9, 2019 I told Elmira Karimova-Cromas that we should end our relationship because of ongoing arguments and issues which she refused and continued to accuse me of what she believed wrongdoings spending time with my son.
68. During the month of October of 2019 I started to see a therapist to cope with all the stress and emotional harm caused by Elmira Karimova-Cromas (Name of therapist and invoices will be provided at discovery).
69. Despite our argument with Elmira Karimova-Cromas I still had feelings and wanted to somehow save our relationship.
70. The fact was that I still loved her and cared about her. At that time I did not even imagine having a life without her.
71. During the month of November 2019 everything was peaceful, until November 28, 2019. On November 28, 2019 at approximately 1:00 am Elmira Karimova-Cromas got into an argument with me because she stated she did not want to be in the relationship with me without a ring.

72. I told her that the ring is not going to solve anything due to the fact we have ongoing issues and problems.
73. I loved her so much that I even offered her to come with me to a relationship counselor but she declined and told me that she is not crazy.
74. That night I locked myself in a guest bed room where Elmira Karimova-Cromas started banging on the door frantically causing damage and ultimately breaking the frame of the door and causing it to open, at which point Elmira Karimova-Cromas under the influence of alcohol and maybe drugs started to attack me with her fist causing bruises around my neck and left rib cage area, thus further ripping my underwear trying to perform oral sex on me (photos of incident of attack is available at discovery).
75. This scenario caused me harm and discomfort as well as fear and emotional distress of the attack.
76. On December 3, 2019 I received a frantic panicking call from my x-wife and my mother about some man going to my wife's neighbors at 229 Division St Cliffside Park 07010 asking questions about her and same for my mother at 566 Anderson Ave in Cliffside Park, New Jersey 07010.
77. This man was un-licensed Private Investigator whom Elmira Karimova-Cromas hired to inquire information about my x-wife's residence in Cliffside Park, New Jersey.
78. This situation put me in more fear and distress potentially fearing for my life and the life of my 8 year old son Stephen Manasher at that time, thus putting me in an awkward situation.
79. I confronted Elmira Karimova-Cromas and told her to stop doing what she is doing immediately.
80. Elmira Karimova-Cromas told me the purpose of her doing this is to find out or spy on my kid while I have parenting time.
81. Elmira Karimova-Cromas further started to cry stating that she loved me and did this because of her insecurity and distrust towards me.
82. This situation brought me grief, discomfort and emotional distress to me and my parents as well as fear for the life of my child Stephen Manasher and my parents.
83. At the time in my opinion I believed if I was to leave Elmira Karimova-Cromas she may do something to harm herself and others and I suffered tremendously staying with a person that may hurt herself, me and people close to me.
84. On December 31, 2019 me and Elmira Karimova-Cromas flew to my old friends New Years Eve Party in Miami.
85. Throughout the whole trip our arguments escalated in a toxic manner, Elmira Karimova-Cromas was humiliating me in front of people in the hotel by screaming and yelling.

86. I sustained emotional harm and stress during that time and tried to get away from her by stating I was meeting up with an old friend.
87. On December 31, 2019 I spent 2 hours on the beach thinking about everything and even contacted my therapist and with concerns as to what I should do and how I should peacefully end this relationship with no harm to me or Elmira KarimovaCromas although deep down I still cared for her and loved her.
88. Upon our return home I discovered that Elmira Karimova-Cromas started to converse with my x-girl friend Mariya Ovechkina from 2013.
89. Mariya Ovechkina lived in Florida at that time and I had no relations with this individual since 2013.
90. On or about June 27, 2023 Mariya Ovechkina reached out to me for advise on a legal matter and I had a long conversation with her about the purpose of Elmira KarimovaCromas call about me in January of 2020.
91. Mariya Ovechkina stated many questions were based on my past relationship with Mariya Ovechkina and my x-wife, with further questions pertaining to my financial status.
92. On or about January 11, 2020 Elmira Karimova-Cromas gave me an ultimatum stating that if we do not marry by the end of January she wants to move out.
93. We had a long conversation together and I stated to her that if I was to make this move she will need some counseling because I was in fear to say "NO" she may do something to hurt my son, x-wife and family.
94. In fact at times led belief I was still thinking maybe Elmira Karimova-Cromas would change if I was going to buy her a ring.
95. On or about January 13, 2020 I purchase a ring from Trax's Jewelers on 47th Street Manhattan, New York (receipt and the actual ring is still available at discovezy) for the purpose to propose if Elmira Karimova-Cromas would change her attitude towards me and seeks counseling. Fact remained I still cared about her deeply and loved her despite all the issues.
96. On or about January 20, 2020 in an argument Elmira Karimova-Cromas threw all my clothes thus destroying some of my property outside of the house at 72 Osprey Court Secaucus New Jersey 07094. Further causing destruction in the house and damage to my personal property. From that date any and all arguments were all recorded as they occurred including this one. That same night Elmira Karimova-Cromas told me verbally that she has another man who she has had sexual relations with{the video recording of this incident will be available at discovezy). This incident caused me

more suffering and more emotional trauma because I still loved Elmira Karimova-Cromas very much and did not know why would she hurt me so much.

97. On or about January 28 and January 29, 2020 I told Elmira Karimova-Cromas that if she does not change I'm going to leave and that is the end of our relationship.
98. Elmira Karimova-Cromas told me not to leave that she loved me and cared for me and that she acts like that because she is insecure.
99. That night I genuinely felt sorry for Elmira Karimova-Cromas but was emotionally drained and suffering inside to the point that I was thinking that I'm the one at fault, that I may be the one that is acting in a way for her to be so violent and negligent causing me emotional trauma.
100. In my mind I knew that our relationship was in shambles and the time for inevitable end was near.
101. From January 29, 2020 until February 14, 2020 me and Elmira Karimova-Cromas tried to work things out although I had distinct fear of Elmira KarimovaCromas potentially doing something to cause harm to me again.
102. On or about February 14, 2020 I decided to be a gentleman and bought flowers, balloons and got Elmira Karimova-Cromas a gift and took her to dinner.
103. I wanted to propose to her that night but I knew rationally the time was not right, although the ring was in my pocket the whole time.
104. After dinner we came home Elmira Karimova-Cromas was extremely upset and was acting very rude towards me, at which point I went to sleep because I did not want to argue.
105. After shortly falling asleep I woke up from loud banging and packing, as Elmira Karimova-Cromas thus destroying some of my property as she was packing her things to leave.
106. I asked Elmira Karimova-Cromas she stated that she is leaving me and she is not coming back further she will be picking up the rest of her stuff after she comes back from her trip.
107. I tried talking to Elmira Karimova-Cromas however I knew that Elmira Karimova-Cromas was determined to leave.
108. In ways after she left I was relieved that no one got hurt and that Elmira Karimova-Cromas is moving on.
109. In many ways it hurt me but when I weighed all the good and bad in our relationship the bad outweighed by massive quantity. I was genuinely distraught and at the same time relieved.
110. On February 15, 2020 I brought a cleaning lady to clean the Townhouse, and at cleaning the cleaning lady discovered a tablet that was underneath the guest bedroom bed.

111. I was curious as to whose tablet it was since Elmira Karimova-Cromas kept all her contents in her closet locked.
112. I decided to turn the tablet on.
113. What I discovered caused me more trauma and distress and more unrest to the point that I broke down in tears.
114. It appears this tablet belonged to Elmira Karimova-Cromas and displayed her past and present relationship with different men.
115. Including sexual explicit photos of herself that were potentially used to solicit herself to other men in the past for money.
116. I further discovered a sexual explicit video of Elmira Karimova-Cromas with Oleg Zhitnikov and one of her other friends Elena Sidorkina in a potential before or after a threesome sexual act as was portrayed in Russian language on the video and demeanor.
117. In turn I felt that my whole world collapsed led belief that Oleg Zhitnikov was Elmira Karimova-Cromas friend.
118. In fact I later found out that he was her friend and occasional sexual partner.
119. This trauma and discovery caused me nothing but harm and emotional distress where I did not know what to even think anymore.
120. After five days Elmira Karimova-Cromas comes back home and informs me that she will move out by the end of the week, screaming breaking things around the house stating, later calling me from blocked numbers, stating she would harm herself and state to the authorities that I harmed her.
121. At that point I had enough, I couldn't take this abuse any longer.
122. On February 19, 2020 I filed a police report in Secaucus Police Department for abuse, threats and etc{Police Report known as 20-006415 will be available at discovery).
123. On February 21, 2020 I placed a deposit on an apartment in Battery Park Manhattan NY, (proof of deposit submission will be proved at discovery) at which point I knew that I will be getting rid of the town house based on Elmira Karimova-Cromas statement of moving out.
124. On February 22, 2020 I discovered that Elmira Karimova-Cromas went to Mexico on February 15, 2020 with her friend and some male whom she had sexual relations with there{photos and videos will be available at discovery).
125. On or about February 26, 2020 Elmira Karimova-Cromas tells me that she is late with her period and she may be pregnant.

126. My whole world turned upside down because as much as I wanted a baby daughter from Elmira Karimova-Cromas now I was faced with the fact that this child may not be mine.

127. On February 27, 2020 we got into a huge argument which led Elmira Karimova-Cromas to physically strike me with an known pole object thus scarring my neck causing a huge bruise. (Photos

128. On March 3, 2020 me and Elmira Karimova-Cromas went to the doctor to confirm pregnancy in which was confirmed to be positive.

129. That day I spoke to Elmira Karimova-Cromas and told her that I'm emotionally destroyed and do not know what to think or do anymore.

130. Deep down inside I was in fear that it may not be my child because of her trip to Mexico and what I found out about her.

131. After all that happened I tried to forget about everything I found in the Tablet and despite all issues I was prepared for Elmira Karimova-Cromas to have the baby and it did not matter if the baby was mine or not.

132. During the month of March 2020 there were no issues and I supported Elmira Karimova-Cromas pregnancy, in fact in ways I wanted to forget about the past and wanted to close my eyes however my emotional trauma of the past with her was just too much to deal with.

133. On March 22, 2020 a state of emergency COVID-19 was announced with a Federal Mandate.

134. At that time I was praying that me and Elmira Karimova-Cromas do not argue over anything because now I was not only worried about myself and loved ones but unborn baby.

135. On or about April 4, 2020 Elmira Karimova-Cromas left the house after an argument stating she will abort child.

136. At the time Covid-19 mandate was in place I rushed to prevent Elmira Karimova-Cromas from aborting our unborn child.

137. This experience caused me so much grief and emotional distress that I almost had a heart attack my blood pressure was above normal.

138. Finally after two hours of talking to Elmira Karimova-Cromas I talked her into coming back home and not abort our child.

139. On April 15, 2020 Elmira Karimova-Cromas started arguing with me over the fact that I was working nights to help out one of my ventures which was a 24-hour business dealing with Auto Towing.

140. During Covid-19 I couldn't attend to my other businesses and ventures including my legal career because of the federal Covid-19 mandate and this was the only business that I had that was operating at the time and bringing food to the table.

141. During Covid-19 my Towing Business was suffering tremendously, I had four drivers that quit and one of which was sick with Covid-19.

142. My business was short of drivers and dispatchers, at night I worked to help out my business because we had contracts with the City of Newark PD, East Orange PD, Irvington PD, Garden State Pkwy and NJTPKE.

143. Even though there were not that many cars on the road during Covid-19 we were still busy due to the fact we were one out of seven companies operating during Covid-19 Mandate risking our lives servicing the areas referenced above.

144. I knew that I had to work in order to keep a roof over Elmira Karimova-Cromas and my unborn baby.

145. At the same instance I also worked nights to prevent any potential other arguments that may arise between Elmira Karimova-Cromas and myself , in a way I was just trying to keep distance to cope with all the distress and issues from the past.

146. On April 15, 2020 after coming back from my shift a heated argument started by Elmira Karimova-Cromas because of me working nights, to the point where once again Elmira Karimova-Cromas started insulting me, throwing different objects around and eventually stating the following phrase that I will never forget: "I'm going to have this baby and sell him/her to Thailand for Organs": I was shocked and started shaking I couldn't bare with the thought of Elmira Karimova-Cromas saying this to me because I took her serious and was on high alert that she may do something with my child. For the record this incident caused me to have high blood pressure and I incurred enormous amount of stress. I did not want Elmira Karimova-Cromas to stress as well or do anything to lose our unborn child nor did I want her to sell my unborn child for Organs, the thought of this issue was making emotionally stressed, and I developed anxiety.

147. From April 15, 2020 until May 15, 2020 I was working to pay the rent and sustaining my business as well as trying not to get in any arguments with Elmira Karimova-Cromas.

148. On May 17, 2020 as I was eating dinner watching a clip on my phone, Elmira Karimova-Cromas came down frantically struck me in the face screaming that I said something to my x-wife regarding Elmira Karimova-Cromas's pregnancy, further she took a belt in her hand and stated she was going to beat herself and state that I caused her harm if I ever was to go see my son or my x-wife again (video

recording of this incident is available and will be provided at discovery). I did not know what to say or how to react. The sight of a woman pregnant acting in this demeanor put another strain of emotional distress once more causing an anxiety attack where I almost fainted.

149. On June 2, 2020 as I was leaving to work at night Elmira Karimova-Cromas threw all my clothes from the upstairs master bedroom down to the garage thus damaging some of my contents and clothes and further walking on them purposely.

150. I asked and begged for Elmira Karimova-Cromas to stop screaming because I was scared that she may do something to hurt me, herself or the unborn baby at the time.

151. That night Elmira Karimova-Cromas raced out of the house saying she will go to abort our unborn child.

152. I tried talking to Elmira Karimova-Cromas however was trying to avoid any physical contact for her not to hurt me, herself, or our unborn baby.

153. Elmira Karimova-Cromas left that night and came back at 6:00 am claiming she slept in the car.

154. That night I missed a day of work that impacted my business in a negative way where I almost lost an account with Irvington PD.

155. This incident added more weight to all of my emotional distress and heart ache.

156. On June 28, 2020, I got a call from Elmira Karimova-Cromas stating she is aborting our unborn baby if I do not come home.

157. I dropped everything I was doing and rushed home, I saw that Elmira Karimova-Cromas had packed suit cases and her throwing objects around.

158. I asked her to stop screaming and Elmira Karimova-Cromas threw a picture frame of us at me striking me in the throat leaving bruises. (Photos will be provided at discovery)

159. I panicked and locked myself in the bathroom from Elmira Karimova-Cromas and she continued to scream at me and would not allow me to exit the bathroom or allow me to leave. (Video of the incident will be provided at discovery)

160. On July 18, 2020 I was working a night shift and had a huge issue at work where all of our data dispatch systems crashed and required all manual dispatches by phone as I was working I received a disturbing message of Elmira Karimova-Cromas at 10:58 PM accusing me of sleeping with my wife at that moment, I did not reply to the message because I was fixing the issue and was concentrated at work (Receipt of hours worked and text message from Elmira Karimova-Cromas will be available at discovery).

161. On July 19, 2020 Elmira Karimova-Cromas after arguing over texts and me coming home from work Elmira Karimova-Cromas threw all my clothes out on the street and smashed my property specifically a personal item photo, Elmira KarimovaCromas was screaming from the top of her lungs telling me to that she is leaving, that day Elmira Karimova-Cromas and struck me in the face with a suitcase, after which I called the Secaucus Police Department as Elmira Karimova-Cromas was screaming at me and throwing objects around the house

162. The police requested Elmira Karimova-Cromas to leave the house and asked me if she hit me and questioned the bruise on my face from the suit case. I stayed quiet from shock and the Police asked Elmira Karimova-Cromas to calm down.

163. I told the police of all of our issues however did not disclose the attack and advised them that she is pregnant and the last thing I want is for her to get in trouble or be arrested during Covid-19.

164. The Police advised Elmira Karimova-Cromas to calm down I refused to sign a complaint.

165. Police wrote a police report known as 20-024828 dated July 19. 2020.

166. After the police left I tried to leave the house and I was not let out by Elmira Karimova-Cromas as she was standing blocking me to leave (video of the incident will be available at discovery).

167. That day put me in a bind emotionally with anxiety where I couldn't breathe and ended up fainting further discovering myself on the floor my garage at work, that night I came back and Elmira Karimova-Cromas was gone out of the house for two days. I was worried and called her many times however had no responses.

168. On July 27, 2020 Elmira Karimova-Cromas in a heated argument stated that she was going to fall down the steps and tell everyone I pushed her, I recorded this conversation since how I understood at that point I needed to protect myself from the incident that occurred on July 19, 2020 (voice recording is available from the conversation and will be provided at discovery).

169. From July 27, 2020 I tried to stay away from my domicile and involved myself in an ongoing venture project in Newark and continued to work to provide for Elmira Karimova-Cromas and my unborn baby up until August 16, 2020 when Elmira Karimova-Cromas threw a clothes hanger at me almost severing my eye when I started arguing with her about her trip and questioned where she was on July 19, 2020, after an argument Elmira Karimova-Cromas packed her things and stated she is leaving to Russian Federation.

170. I stated not to do it and as I was bleeding on the side of my eye I noticed blood on the back of my shirt it appears that when the hanger hit me it bounced off my back and left a huge scratch (photo is available and will be provided at discovery).

171. That morning once again Elmira Karimova-Cromas started throwing all the objects and left the house and did not come back until August 19, 2020.
172. I tried calling Elmira Karimova-Cromas however was unsuccessful to see if she was okay even called her sister in Russian Federation and was told that she is not there.
173. On August 19, 2020 Elmira Karimova-Cromas came back home I questioned her where she was and she told me to "Fuck off and told me she was another who is who she is intimate with and that if I don't leave the house she is going to fall and say I did it " and further proceeded to throw a night lamp at me in the basement.
174. I immediately left the house and went to Secaucus PD and filed a police report known as 20-030548 dated August 19, 2020.
175. That day after the police I did not go home I went to work and stayed there all day.
176. On August 20, 2020 I received a threatening call from Elmira Karimova-Cromas requesting for me to pay her obscene amount of money and rent her an apartment, I declined and hung up the phone, as I was getting out of the chair at work I collapsed unconscious with my workers trying to revive including calling the paramedics that came out(Event # from the Paramedics will be provided at discovery).
177. After I was revived the paramedics arrived. I declined to go to the Hospital, I immediately went to Secaucus PD and filed a restraining order against Elmira Karimova-Cromas police report know as 20-030810 and TRO known as FV-09-43921(will be produced at discovery)
178. After this incident I was diagnosed with permanent anxiety and high blood pressure syndromes as well as emotional irreparable harm.
179. On or about September 4, 2020 I made a decision enter into Civil Restraints with Elmira Karimova-Cromas on a condition for her to move out and I would pay the expense of getting an apartment and cover other expenses and dismiss the TRO all was agreed by both of us(civil restraints will be produced at discovery).
180. On September 9, 2020 as the dismissal of the TRO was ordered by the Judge Elmira Karimova-Cromas came and picked up her immediate belongings.
181. Throughout September of 2020 I tried keeping minimal contact with Elmira Karimova-Cromas but was on call and on guard if she was going to give birth.
182. We both agreed that Elmira Karimova-Cromas would call me in the event she goes to labor and I would immediately take her to the hospital.

183. On October 1, 2020 Elmira Karimova-Cromas called me and told me she is in labor I rushed at and panicked at midnight to take her to the hospital turned out to be nothing.

184. That night Elmira Karimova-Cromas asked me for her to stay at 72 Osprey Court Secaucus New Jersey.

185. I told her that I don't have an issue with that as long as she will be okay and that if she has anymore spasms for labor I'm next to her. The next day Elmira Karimova-Cromas leaves and I go to work.

186. On October 5, 2020 Elmira Karimova-Cromas called me crying asking me to come see her at her apartment in Secaucus. I immediately dropped what I was doing and came to her aid.

187. Elmira Karimova-Cromas started saying that she is very sorry for everything that happened and she wanted me to forgive her and for her to come back home.

188. I told her that there were way to many incidents and I just want things to be the way they are for now.

189. She asked me if she could stay with me that night because she wanted me to rub her belly and I did because I genuinely loved her and my unborn baby despite everything that happened.

190. That night Elmira Karimova-Cromas spent the night with me in my town home and I left for work that next morning.

191. Upon coming home on the October 6, 2020 I noticed that Elmira Karimova-Cromas moved all her contents back into the house without my consent.

192. I told her that I did not agree with this and told her that she is violating the civil restraints.

193. After talking she told me that she is scared to be alone and if she give birth no one will be around and asked me if she can stay I did not respond and left the house.

194. That day Elmira Karimova-Cromas started calling me on my phone where I specifically told her that the purpose of the civil restraints was to follow it and that I paid money for her apartment approximately \$4500.00 for her to move out.

195. I was extremely upset with Elmira Karimova-Cromas and told her whatever she is doing it is not right, that day when I came home we had another argument where the police came to the house and I left because I did not want to an argument or sustain stress reoort 20-039237 (October 7. 2020 ohone voice conversation available and will be available at discovery).

196. From that day on I was devastated and tried to spend as less time at home as I can or avoid any and all confrontation with Elmira Karimova-Cromas.

197. On October 17, 2020 I received a call from Elmira Karimova-Cromas stating that she is going to the Hospital to give birth I was excited and she told me that she will be doing it alone and does not want me around.

198. Further on October 17, 2020 Elmira Karimova-Cromas states to me by text that it is not my child and I quote "She is not your baby it's a Mexican Baby" in Russian language. (Text message is and will be available at discovery)

199. This ruined me to the point I couldn't eat or drink nor even think, I fell into severe depression as well as sustained high blood pressure and emotional distress.

200. On October 17, 2020 I went home and discovered that Elmira Karimova-Cromas is home and she didn't give birth as she stated earlier I quietly went to my room and locked the door.

201. On October 20, 2020 as I was at work Elmira Karimova-Cromas called me and told me she is once again going to give birth. I told her that I don't know how to react you said it was not my child. And her response was that she was kidding.

202. On October 20, 2020 I came to the hospital and was not led in because of Covid-19 mandate where only one individual was allowed upstairs and Elmira Karimova-Cromas's friend Victoria Kolarzh was upstairs with her.

203. I stayed in the lobby until Elmira Karimova-Cromas gave birth to my beautiful baby daughter Celine.

204. Unfortunately I couldn't get in that night and was provided videos from Victoria.

205. The next day I came to the hospital and brought Elmira Karimova-Cromas flowers, even though I was hurt and in the back of my mind not knowing the truth of if the child maybe not mine.

206. The day after I went to pick up Elmira Karimova-Cromas from the hospital and she approached me to sign a COP.

207. I asked her specifically am I the father? She stated with a smirk.

208. I was so distraught from all the emotional distress and past issues with Elmira Karimova-Cromas I told her to give me the paper she grabs the paper out of my hand as I'm trying to fill in the information and tells me you just rescinded on your child. I said no.

209. She continued on and on instigating an argument.

210. That day I took Elmira Karimova-Cromas and my newborn daughter Celine home.

211. From the date my daughter was brought home I tried to have minimal contact and or arguments with Elmira Karimova-Cromas.

212. On December 19, 2020 I was with my son at an event from school after I took him home at approximately 10:30pm.

213. After dropping off my son I came home to 72 Osprey Court Secaucus New Jersey.

214. As I was walking in the door Elmira Karimova-Cromas started beating me with her fist and legs.

215. I tried to leave instead tried to get away from her ended up upstairs in the master bedroom.

216. Elmira Karimova-Cromas came into the room threw my daughter 2 months old daughter on the bed and started to scream and yell as she was changing my daughters diaper alleging that I was having an affair with my x-wife.

217. I locked myself in the closet listening to her scream and yell because she was acting in a disruptive manner, I couldnt call the police either because of no reception in the closet after approximately 30-40 minutes, Elmira Karimova-Cromas leaves in the cold with my daughter and does not come back until morning leaving me worried as to what she was doing with my child in at late hour of the night (video of the incident will be available at discovery.)

218. The next day I left to Florida not to incur any more stress or emotional distress and came back on January 4, 2021.

219. From approximately January 4, 2021 when I came back until August 2021 I resided with my daughter and Elmira Karimova-Cromas and avoided any issues for the sake of my daughter.

220. On or about July of 2021 Elmira Karimova-Cromas's mother came to United States to assist with the Celine.

221. On August 24, 2021 me and Elmira Karimova-Cromas got into a heated argument thus pushing me out of my own house.

222. That day I made a decision to leave the house for the sake of my daughter Celine and others including myself.

223. I realized that my presence would cause an obscene amount of heartache to me in the long run, emotionally and physically we had an arrangement where the child would live with Elmira Karimova-Cromas for a set period of time until she is at least 3-4 at which point I would have joint custody.

224. From August 24, 2021 I continued to pay the rent at the house where my daughter and Elmira Karimova-Cromas lived with her grandmother.

225. The lease for the town home was still under my name.

226. From August 24, 2021 - July 01, 2022 I paid all the rent and other small expenses.

227. I visited my daughter almost every day when I was in the tri-state area.

228. After July 01, 2022 Elmira Karimova-Cromas told me not to renew the Lease at 72 Osprey Court Townhouse and that she bought a place in the same complex known as 53 Mallard Pl Secaucus New Jersey 07094.

229. I explained to Elmira Karimova-Cromas that I will not be able to pay for her mortgage or rent anymore and will pay \$1500.00 per months for the support of my daughter Celine.

230. Throughout time Elmira Karimova-Cromas told me she had limited amount of money so I continued to cover the rent even when I did not live there, after she told me she bought a house then I believed that she has funds to pay for it monthly as well.

231. I continued to pay \$1,500.00 per month on a monthly basis.

232. Throughout July 1, 2022 until about June 1, 2023 Elmira Karimova-Cromas continued to harass me with negative comments and remarks to make me feel bad and continued to insult me and degrade me as a father, making comments that one of her men is taking care of my daughter and buying her gifts in addition states that this other men stays with my child further stating how she enjoys other men.

233. On or about April 8, 2023 Elmira Karimova-Cromas and an unknown individual appeared at my mother's house at 566 Anderson Ave Cliffside Park New Jersey 07010.

234. My mother Marina Manasher did not open the door because of the individual males suspect intent. The individual male with Elmira Karimova-Cromas identified himself as the Bergen County Sheriff's Officer investigating abduction of Celine Karimova Manasher my daughter and that my mother and myself are the prime suspects.

235. My mother frantic did not know what was happening and asked the guy for his badge at which point the male shouted at my mother not leave the State of New Jersey as he and his superiors will be coming back at 8:00am the next morning to serve her documents.

236. On April 8, 2023 I was on a boat in Florida and had no reception until approximately 6: 15pm.

237. At approximately 6:15pm I saw seven different phone texts to call back my mother from my sister Milena Manasher and my mother.

238. I panicked because my father is ill with stage (4) cancer who frequently stays with my mother and I thought something happened to my dad.

239. I contacted my mother and my sister and was told of the incident.

240. I immediately reached out to Saniia Karimova, Elmira Karimova-Cromas's mother and asked if my daughter was okay? She replied yes.

241. I asked if there were any issues and she replied "no".

242. I contacted the Bergen County Sheriffs Dept of NJ at approximately 7pm and asked if any detectives or officers came to my mother's house investigating an abduction of my daughter?

243. A Bergen County Sheriffs Dispatcher told me no one came and that it is not

244. Bergen County Sheriffs that would investigate crimes in that nature it would be the Police Department of the Jurisdiction of where the complainants lives.

245. I later contacted Elmira Karimova-Cromas and asked her a questions as my sister Milena Manasher and Marina Manasher were all on the phone line.

246. I asked were you home at approximately 10 am?

247. She said "no" she was doing her nails.

248. I asked did she come to my mother's house and she said "no".

249. However Elmira Karimova-Cromas started to get defensive and automatically stating that she would hurt someone if anyone would touch our daughter although the topic as to why I was asking questions was never discussed which led me to believe that Elmira Karimova-Cromas was lying and in fact once again causing more harm and emotional distress this time to me, my mother and my whole family.

250. This incident did not only cause harm to me but to my whole family especially my sick father and mother (the video image of the incident and photos will be available through discovery).

251. On April 11, 2023 Elmira Karimova-Cromas drove by my mother's house and had an individual that appeared to be Elmira Karimova-Cromas come out of her car and throw eggs at my mother's front door with the video footage of Elmira KarimovaCromas navy blue Lexus jeep and the act was captured on video from across the street; (the video of this incident is recorded and will be available at discovery).

252. I requested my mother, my sister not to contact the Police because I was going to address the issue with Elmira Karimova-Cromas's mother Saniya Karimova, I honesty did not want to get her in trouble with the law enforcement.

253. On April 30, 2023 I performed a DNA test with my daughter to be assured of paternity due to the obscene amount of stress and various claims made by Elmira Karimova-Cromas in the past about the child being mine.

254. On or about May 6, 2023 the results of the DNA showed that I was a 100% paternal father of Celine Sophie Manasher.

255. On June 01, 2023 Elmira Karimova-Cromas removed my child to Russian Federation with her maternal grandmother Saniia Karimova for indefinite amount of time, without written consent

willfully neglecting my child by placing her in day care through power of attorney further establishing Russian Federation Citizenship without my authority.

256. At present moment this matter is being heard in Hudson County Court Family Court Custody known as FD-09-11724 also FV-09-000298-24 and FV-09-000233-24 cross restraints.

257. On July 18, 2023 I learned that the maternal grandmother applied to be identified in Russia as the permanent custodial parent, thus neutering any rights that I may have with Celine while in Russia. This is a crucial issue that under Russian Federation authority changes venue automatically upon my daughter's entrance to Russian Federation as a citizen of Russian Federation further let the Court be on record with judicial notice of the following; Russia acceded to the 1980 Hague Convention on the Civil Aspects of International Child Abduction (Hague Abduction Convention) on October 1, 2011; however, the United States and Russia are not yet treaty partners. Until Russia and the United States establish a treaty relationship per Article 38 of the Convention, parents whose children have been abducted from the United States to Russia or wrongfully retained in Russia are unable to invoke the Convention to pursue their children's return or to seek access to them under this provision no court order from the United States will be valid in Russian Federation.) Proof of Russian Citizenship).

258. The ongoing war in Russian Federation with Ukraine escalating by the day with an ongoing retaliatory attacks from Ukrainian Army by drones and various unexpected attacks from Ukrainian extremists thus placing all potential cities in Russian Federation on high alert for rocket and drone attacks and as of February 29, 2024 Defendant once again is trying to remove my daughter from the U.S. to a war zone.

259. From June 1, 2023 through February 18, 2024, I lost enormous amount of unsupervised parenting time with my daughter due to Defendants malicious and unlawful actions by purposely alienating the child away from me further committing an act of parental interference.

260. From June 1, 2023 through February 18, 2024, Defendant and defendants maternal grandmother taught and continues to teach the child unlawful disparaging remarks directed at me, further the defendant and defendants mother is teaching the child to be scared of me, will be provided at the hearing Russian interpreter will be required, further on or about September 2023 while the child's maternal grandmother was in the car with me the child stated multiple disparaging remarks directed at

me witnessed by Stephen Manasher and my self. (*a video of the child portraying awful remarks towards plaintiff to her brother Stephen Manasher*) (Video will be produced on May 9, 2024 hearing)

261. On January 16, 2024 the defendant committed a Criminal Act of Coercion N.J. 2C:13-5 specifically "perform any other act which would not in itself substantially benefit the actor but which is calculated to substantially harm another person with respect to his health, safety, business, calling, career, financial condition, reputation or personal relationships" "Bring about or continue a strike, boycott or other collective action, except that such a threat shall not be deemed coercive when the restriction compelled is demanded in the course of negotiation for the benefit of the group in whose interest the actor acts", defendant brought to court a known criminal terrorist radical by the name Islam Nikitin AKA Igor who is currently detained with whom the I had an ongoing dispute with, the soul motive for the actor/suspect was to intimidate me with various gestures outside of the courtroom on January 16, 2024 and further provide the court with fabricated and fraudulent testimony coerced for the benefit of the defendant with defendants involvement with intent to induce, intimidate and force the me to enter into state of duress, with a substance to further alienate the child away; by way of plaintiff entering into supervised visitation through unconscionable restraints under duress on January 16, 2024 Consent Order thus causing an irreparable harm to my relationship with my daughter even more.

262. Due to defendants malicious and unlawful acts of January 16, 2024 and prior incidents of continued parental alienation, I was compelled and left with no other choice throughout February 2024 to seek help from the various legal and law enforcement authorities.

263. At present time, multiple New Jersey State Law Enforcement Agencies including the Federal Bureau of Investigation, Newark Field Office and the Hudson County Prosecutors Office with complaint file numbers to be disclosed through discovery or sooner if deemed appropriate to be corresponded to the current Court by Law Enforcement directly upon completion with an ongoing investigation in relation to this matter, further involving and naming the defendant's one other male co-conspirator who was present in court throughout all trial proceedings on October 19, 2023 and January 16, 2024 at the New Jersey Hudson County Superior Court is also being investigated with the

defendant for harassing the plaintiff's mother at her domicile in Cliffside Park, New Jersey on April 8, 2023 posing himself as a Private Investigator in 2019 and further impersonating a Bergen County Sheriff's Officer on April 8, 2023 with defendant at the scene will be known at hearing *(as directed by all Law Enforcement Agencies all Police File numbers and Hudson County Prosecutors Office Docket for investigation will be revealed to the Courts directly or through discovery.)*.

264. Throughout this whole experience with Elmira Karimova-Cromas I've sustained nothing but massive emotional trauma and I have to speak to a therapist on regular basis in trim caused severe fear that the Defendant may hurt our daughter potentially hurting our daughter Celine Manasher

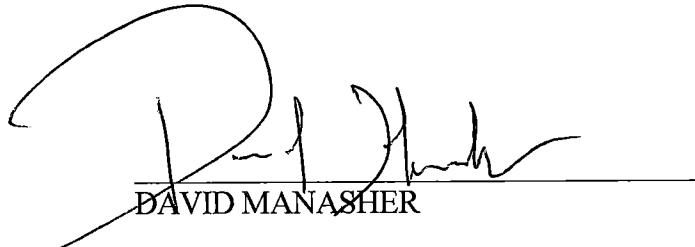
265. Furthermore not to mention physical harm I sustained throughout our who relationship together and after, emotional distress, permanent anxiety disorder, emotional discomfort, the negligence of Elmira Karimova-Cromas is not only toxic to me or my family and my daughter daughter Celine Manasher.

266. I respectfully ask this Court and pray for relief outlined in the current complaint.

I certify that any documents I submit to the Court in conjunction with this application are true and accurate and accurately represent everything that appears on the face of each.

267. Pursuant to Certification in Lieu of Oath "I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment."

Dated: March 21, 2024



A handwritten signature in black ink, appearing to read "DAVID MANASHER", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized 'D' on the left and a more compact 'MANASHER' on the right.